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September 28, 2018

Via ECF

Honorable Michael A. Hammer, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King Building & US Courthouse
50 Walnut Street, Room 4015
Newark, NJ 07101

Re: Pharmacia Corp. n/k/a Pfizer Inc. v. Arch Specialty Ins. Co. et al.
Docket No.: 2:18-cv-00510-ES-MAH

Dear Judge Hammer:

We represent Defendant Twin City Fire Insurance Company ("Twin City"). Pursuant to paragraph 5 of the Pretrial Scheduling Order in this case (Dkt. No. 56), Twin City provides this further response to the Letter Motion to Compel production of documents ("Motion") filed by Plaintiff Pharmacia Corporation n/k/a Pfizer, Inc. ("Plaintiff").

Plaintiff and Twin City have resolved the discovery disputes at issue in Plaintiff's Motion. Plaintiff has asked that Twin City place two representations on the record regarding the disputed documents.

Claims Handling Guidelines

Twin City located a claims manual for Hartford Financial Products ("HFP") from 2002; however, the manual does not address any coverage issues, including the coverage issues in this case (attachment point, related claims, warranty). The 2002 manual simply addresses the administrative logistics of claim handling, such as how to set up a file and update it. Our prior representation to you that Twin City does not have any documents relating to exhaustion, related claims, etc., applies to the claim handling guidelines as well. The HFP claims manual has been updated since 2002. However, the current manual and, to the best of our client's knowledge, any interim versions of the claims manual likewise address only internal procedures for setting up and managing claims and do not address any coverage issues.

Organizational Charts

Twin City searched for organizational charts and after a comprehensive search was able to locate two organizational charts from 2003. Twin City will produce those organizational charts

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to Plaintiff. On the claims side, Twin City has not located any HFP claims organizational charts prior to 2015. This is not the same organizational structure relevant to Twin City's handling of the Garber claim in the 2013 time period (or earlier). Accordingly, Plaintiff's counsel and Twin City's counsel agreed that the 2015 organizational chart was not relevant to the litigation; however, Twin City will provide a supplemental response to Plaintiff's Interrogatory No. 3 clarifying the claims-related organizational structure in a more "linear" fashion for the time period relevant to Twin City's consideration of coverage for the Garber claim.

Twin City shared this letter with Plaintiff's counsel prior to filing, and Plaintiff's counsel authorized us to represent to the Court that the representations set forth in this letter are sufficient to resolve the discovery dispute between Plaintiff and Twin City.

Respectfully submitted,

CLYDE & CO US LLP



Marianne May

MM/Imm

cc: All counsel of record (via ECF)